REMARKS

Claims 1 through 24 are pending in the application.

Claims 15-24 are rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claim 15 is amended to obviate the rejection, and therefore Applicants submit that the 101 rejection of claims 15-24 is overcome.

Claims 1-7 and 11-24 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,847,942 to Land et al, hereinafter "Land". Claims 1, 5, 11 and 15 are independent claims. Applicant respectfully traverses this rejection.

Claim 1 provides a system for assessing risk. The system includes a user interface to receive requests and customer account information to be stored in a portfolio in a first database, a risk assessment manger that provides application functions, services and portfolio analysis based on said requests, a data integration component that provides access to at least a second database, and a corporate linkage component that provides information used in determining a total risk exposure based on said portfolio.

Land discloses an accounts receivable system (ARS) and processes for providing credit and collection services including credit evaluation and credit granting (col. 1, lines 27-37). The system includes five modules, including a Credit Inquiry Module, a Remittance Processing Module, an Accounts Receivable claim Module, a Maintenance Module, and an Administration Module (col. 1, lines 44-47). The Credit Inquiry Module reviews payment history and performs credit inquiries by going into a customer account and viewing a diverse supply of data used for customer analysis, credit management, and customer contact (col. 1, lines 54-59). The Credit Inquiry Module predicts overall cash forecasting for the client based on customer payment data,

and is utilized for account reconciliation and audit verification for tracking transactions at the customer level (col. 1, lines 59-63).

Land discloses the use of the ARS in performing a credit check of a customer. When a customer has placed a purchase order, the ARS receives a request for approval, which is routed to a designated credit officer (col. 7, lines 48-53). The designated credit officer then performs a credit investigation (col. 7, lines 53-62). The ARS electronically interfaces with Dun & Bradstreet or other credit reporting agencies for searching and identifying a customer by name, address and telephone number and obtaining reports (col. 8, lines 1-6). Based on the credit investigation, the designated credit officer determines whether credit should be granted to the customer (col. 8, lines 7-9). Each month, the ARS receives feeds from Dun & Bradstreet and other credit reporting agencies, from which ownership changes, rating changes, judgments, and large decreases in Paydex or Payment Index scores are reported to a designated credit officer in a hard copy report (col. 12, lines 43-50).

Land discloses a system for providing credit information to a user such as a credit officer. This information, which is taken from a customer account and/or from credit reporting agency databases, is used by the credit officer in determining a creditworthiness of a customer. Although the system is purported to perform overall cash forecasting, the system **does not itself perform credit analysis** of data retrieved from the databases. Such analysis is performed by a user based on information provided by the system. Therefore, Land does not disclose or suggest a system for assessing risk that includes "a risk assessment manger that provides application functions, services and **portfolio analysis** based on said requests," as recited in claim 1.

Thus, Land does not disclose or suggest the elements of claim 1. Therefore, claim 1 is patentable over Land.

Claims 2-4 depend from claim 1. For at least reasoning similar to that provided in support of the patentability of claim, claims 2-4 are patentable over Land.

Claims 5 and 11 include recitals similar to claim 1. For at least reasoning similar to that provided in support of claim 1, claims 5 and 11 are patentable over Land.

Claims 6-10 depend from claim 5, and claims 12-14 depend from claim 11. For at least reasoning similar to that provided in support of claims 5 and 11, claims 6-10 and 12-14 are patentable over Land.

Claim 15 provides a computer-implemented method of assessing risk. The method includes enhancing data in a portfolio of customer accounts by a quality assurance process, receiving and enforcing at least one user-defined rule and/or at least one user-defined policy, providing automated credit decisioning for at least one customer based on at least one user-defined rule and the at least one user-defined policy, providing days sales outstanding for said at least one customer in said portfolio, and providing risk information for said at least one customer in said portfolio.

The Office Action contends that Land discloses "days sales outstanding" at column 13, lines 34-45 and Figure 18. However, Land merely discloses a display of sales information including a date of last sale, year-to-date sales and unshipped orders. Land **does not disclose a days sale outstanding**, which is defined in the specification as a number reflecting an average number of days to collect outstanding debt from customers, and which is calculated from a sales period, a sales figure and a total amount owed (see specification, par. [0043]). Therefore, Land does not disclose or suggest a method including "providing days sales outstanding for said at least one customer in said portfolio," as recited in claim 15.

Thus, Land does not disclose or suggest the elements of claim 15. Therefore, claim 15 is patentable over Land.

Claims 16-24 depend from claim 15. For at least reasoning similar to that provided in support of claim 15, claims 16-24 are patentable over Land.

For the reasons set forth above, the rejection of claims 1-7 and 11-24 under 35 U.S.C. § 102(e) as anticipated by Land is overcome. Applicants respectfully request that the rejection of claims 1-7 and 11-24 be reconsidered and withdrawn.

Claims 8-10 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Land. Claims 8-10 depend from independent claim 5. Applicant respectfully traverses this rejection.

As discussed above, the system disclosed in Land does not perform credit analysis of data retrieved from databases. Therefore, Land does not disclose or suggest a system for assessing risk that includes "a portfolio analysis component that analyzes a portfolio of customer accounts," as recited in claim 5.

Thus, Land does not disclose or suggest the elements of claim 5. Therefore, claim 5 is patentable over Land.
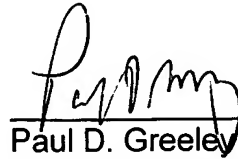
Claims 8-10 depend from claim 5. For at least reasoning similar to that provided in support of the patentability of claim 5, claims 8-10 are patentable over Land.

For the reasons set forth above, it is submitted that the rejection of claims 8-10 under 35 U.S.C. § 103(a) as unpatentable over Land is overcome. Applicants respectfully request that the rejection of claims 8-10 be reconsidered and withdrawn.

An indication of the allowability of all pending claims by issuance of a Notice of Allowability is earnestly solicited.

Respectfully submitted,

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